REMARKS

Claims 1-36 and 46 are now pending in the application. Claims 37-45 have been cancelled and claim 46 has been added as new. Support for the foregoing amendments can be found throughout the specification, drawings, and claims as originally filed. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

REJECTION UNDER 35 U.S.C. § 102

Claims 1-6, 10, 12, 13, 19-24, 28, 30, 31, and 37-45 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Shimomura et al. (U.S. Pat. No. 6,952,665). This rejection is respectfully traversed.

Claim 1 recites "a source datastore of primary source parameters providing information mainly about a speaker of a primary language." Applicant respectfully traverses the Examiner's assertion that the word dictionary (17) shown in Shimomura anticipates the above features. Shimomura states, at column 4, lines 24 to 26, that "[t]he dictionary database 17 contains a word dictionary describing information on the pronunciation of each word to be recognized." In other words, the dictionary database (17) provides information about how each word should be pronounced, possibly by a speaker. The dictionary database (17), however, does not provide information about the speaker.

Claim 1 further recites that "at least one secondary filter parameter is normalized to the primary filter parameters and mapped to a primary source parameter." In the rejection, the Examiner asserts that Shimomura teaches "normalizing the translation

(abstract) using the knowledge database and dialogue history storage unit – fig. 7, subblock 46)" and thus anticipates the claimed feature. Applicant is unable to fully ascertain the Examiner's rationale. Shimomura appears to show a dialog management unit (5) tries to semantically translate the meaning of words by the machine translation unit (3) and by referring to a knowledge database (46) and a dialogue history storage unit (47). Further, "by referring to is the various knowledge and the dialogue history, ambiguous meanings and incompleteness of the translation being processed are eliminated, enabling precise translations based on semantic understanding." (See column 6, lines 33 to 67). As best understood by Applicant, the Examiner appears to consider that the above mentioned semantic understanding process as analogous to the claimed normalization. Applicant submits that, contrary to the Examiner's assertion, one of ordinary skill in the art would not interpret the claimed normalization as the above mentioned semantic understanding process. One of ordinary skill in the art would appreciate that normalizing filter parameters typically involves adjusting similarities of sounds, which substantially differs from semantic understanding of the text.

Further, claim 3 recites "a mapping module adapted to map the secondary filter parameters to the primary source parameters based on linguistic similarities between target sounds in the secondary language and primary source parameters in the primary language."

In the rejection, the Examiner asserts that Shimomura, especially at column 6, lines 1 to 7, teaches analogous features. Applicant respectfully traverses the Examiner's assertion. Shimomura generally shows that a system having a speech recognition unit can recognize a speech in a first language. The system further

translates the recognized result, by a machine translation unit, to a second language. Then, the translated result is input to a speech synthesizing unit and the speech synthesizing unit generates a speech in the second language in response to the input.

The specifically cited portion of Shimomura (i.e., column 6, lines 1 to 7) states "[t]he text analyzer (31) performs, based on the word dictionary and the analyzing grammar rules, analyses of the input text, such as a morphemic analysis and a syntactic analysis, and extracts information required for ruled synthesization of speech by a rule synthesizer (32) at the subsequent stage." The text shows a process of the speech synthesizing unit (3). Generally, the speech synthesizing unit three receives input text in the second language that is translated by the machine translation unit (2). Then the speech synthesizing unit (3) analyzes the input text based on rules it may have and generates a speech in the second language based on the input text. In short, the speech synthesizing unit (3) operates in a single language environment (i.e., it receives text input in a language and then generates a speech in that same language); it does not appear to concern about "linguistic similarities between target sounds in the secondary language and primary source parameters in the primary language" (i.e., linguistic similarities between two languages) as required by claim 3.

Claim 19 recites features similar to one or more of the distinguishing features of claim 1. Claim 21 recites features similar to one or more of the distinguishing features of claim 3.

In view of the foregoing, Applicant submits that claim 1 and its dependent claims 2 - 18 define over the art cited by the Examiner. Claim 19 and its dependent claims 20 -

36 define over the art cited by the Examiner for one or more of the reasons set forth above regarding claim 1 and 3.

NEW CLAIMS

Applicant has added claim 46 to provide varied scope of protection.

Claim 46 recites, as one example of its many distinguishing features, "a mapping module that selects at least one from the plurality of primary source parameters to substitute at least one of a plurality of secondary source parameters based on linguistic similarities between a target sound defined by the substituted at least one secondary source parameter and a target sound defined by the selected at least one primary source parameter." Applicant submits that the cited art appears silent about this feature.

In view of the foregoing, Applicant believes that claim 46 defines over the art cited by the Examiner.

ALLOWABLE SUBJECT MATTER

The Examiner states that claims 7-9, 11, 14-18, 25-27, 29, and 32-36 would be allowable if rewritten in independent form.

Applicant elects to defer rewriting the allowable claim until the Examiner has considered the amendments and arguments made herein.

CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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